

To: CARB

From: Tom Becker

Subject: Advanced Clean Fleets Rulemaking public comment.

- 1- All air pollutant reductions required for the state to meet federal air quality standards can be achieved by reducing VMT in the state.
- 2- Reducing imports into the ports of Los Angeles/ Long Beach by at least 50%, with the corresponding reduction in truck, port equipment and shipping activity, can result in the South Coast Air Basin achieving federal air quality standards with no additional on-road and off-road vehicle emission standards, such as those proposed in the Advanced Clean Fleets Rule.
- 3- Reducing VMT in all on-road vehicle categories by 15%, and maintaining that reduction, is feasible.
- 4- The State of California requesting an emission waiver from U.S EPA for emission standards that are unnecessary for the state to achieve federal air quality standards is unlawful.
- 5- The state's imposing unnecessary emissions standards on vehicles sold in California will adversely impact consumers in other states, as vehicle manufacturers will be required to build all their vehicles to meet California's unnecessary emission standards. That would violate the Commerce Clause.
- 6- Statewide GHG emissions from on-road and off-road vehicles can be reduced by 85% using the existing fleet by converting the state's current petroleum-based fuels to GHG closed loop biofuels, such as biodiesel, bioethanol and biobutanol. The state's favoritism towards battery powered vehicle manufacturers and battery powered vehicles harms manufacturers of other technologies and may be unlawful.
- 7- The State of California has officially accepted the scientific conclusion that worldwide GHG reductions greater than 50% from the year 2000 baseline will have an insignificant impact on the reduction of atmospheric GHG concentrations.

Thank you,

Tom Becker, Buellton, CA

